

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

PROXENSE, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS, CO., LTD. and
SAMSUNG ELECTRONICS AMERICA, INC,

Defendants.

Civil Action No. 6:21-CV-00210-ADA

JURY TRIAL REQUESTED

**DECLARATION OF DAVID L. HECHT IN SUPPORT OF PLAINTIFF
PROXENSE, LLC'S OPPOSITION TO DEFENDANTS' MOTIONS *IN LIMINE***

I, David L. Hecht, am counsel for Plaintiff Proxense, LLC, over 18 years of age and make this declaration based upon personal knowledge. If called to testify as a witness, I could and would testify competently to the same. I submit this declaration in support of Plaintiff Proxense, LLC's Opposition to Defendants' Motions *In Limine*.

1. Attached hereto as Exhibit 1 is a compilation of true and correct copies of 2017 emails that Yoon Goo Lee, Samsung's principal engineer on its IP team, sent to Proxense's representatives on May 10, May 11, May 16, May 17, May 22, June 9, June 16, July 12, August 14, September 4, September 24 (two emails), and December 13, comprising Samsung's proposed exhibits 19, 21, 22, 23, 24, 38, 42, 47, 50, 51, 74, 76, and 79.

2. Attached hereto as Exhibit 2 is a true and correct copy of the excerpts of the deposition of Hye Jin Kim dated July 18, 2022

3. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the Rebuttal

Expert Report of Chris Bakewell, dated September 12, 2022.

4. Attached hereto as Exhibit 4 is a true and correct copy of IPR decision, dated February 28, 2022, denying petition number 2021-01447, related to U.S. Patent No. 9,298,905.

5. Attached hereto as Exhibit 5 is a true and correct copy of IPR decision, dated February 28, 2022, denying petition number 2021-01448, related to U.S. Patent No. 10,698,989.

6. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the deposition of Woo Yuel Lee, dated September 8, 2022.

7. Attached hereto as Exhibit 7 is a true and correct copy of the Supplemental Expert Report of Aviel D. Rubin, Ph. D, dated September 14, 2022.

8. Attached hereto as Exhibit 8 is a true and correct copy of the Second Errata for the Expert report of Seth Nielson, Ph.D served on October 4, 2022.

9. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of the Corrected Rebuttal Expert report of Seth Nielson, Ph.D, served on September 30, 2022.

10. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the Expert Report of Aviel D. Rubin, Ph. D, dated August 15, 2022.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed in Livingston, NJ on December 5, 2022



David L. Hecht